From: Siu, Jennifer

To: Schlipf, Robert@Waterboards
Subject: RE: Cargill - Redwood City inspection
Date: Monday, December 14, 2015 10:15:00 AM

Thanks Robert! That's makes more sense to me now.

Jennifer Siu
Life Scientist, Wetlands Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
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415-972-3983
Siu.Jennifer@epa.gov

From: Schlipf, Robert@Waterboards [mailto:Robert.Schlipf@waterboards.ca.gov]

Sent: Monday, December 14, 2015 8:34 AM **To:** Siu, Jennifer <Siu.Jennifer@epa.gov> **Subject:** RE: Cargill - Redwood City inspection

Hi Jennifer,

This is before my time, but here's what I think all of this means. The last NPDES Permit for this site (Order No. 88-163, NPDES No. CA0028690) permitted discharge of rainwater from one of the salt crystallizer ponds provided it met certain effluent limits (e.g., total dissolved solids). The "NPDES LT970626" is a letter that rescinded Order No. 88-163. This seems pretty clear from the CIWQS entry on my side of things. Unfortunately, we have searched many times for that letter, but cannot find it.

In 1997, the site probably stopped discharging waste from its crystallizer pond, but still had industrial stormwater discharges. So, it just sought/continued coverage under the General Stormwater Permit. The site inspection from 2013 may have been to confirm there were no waste discharges from any of the remaining crystallizer ponds (i.e., confirming that the NPDES Permit No. CA0028690 for discharges from the crystallizer pond was still inactive). At that time, there still could be activity on the stormwater side of things as you point out.

Hopefully, the above makes sense. If you want to discuss, please let me know. Thank you, Robert 510.622.2478

From: Siu, Jennifer [mailto:Siu.Jennifer@epa.gov]

Sent: Friday, December 11, 2015 9:18 AM

To: Schlipf, Robert@Waterboards

Subject: FW: Cargill - Redwood City inspection

Morning Robert,

Quick question for you on this record. The NPDES identification box states 'NPDES LT970626'. However, the NPDES permit number in other records I have for the RWC site is noted as CA0028690. Can I assume these are the same NPDES permits despite the numbering difference? I am also getting confused because the site falls under the Industrial General Permit (91-13DWQ; 97-03DWQ) and I have records from 2013 showing it was still active... but this CIWQS inspection shows the site is inactive??

Any thoughts?
Jennifer

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From: Schlipf, Robert@Waterboards [mailto:Robert.Schlipf@waterboards.ca.gov]

Sent: Wednesday, October 21, 2015 12:52 PM

To: Siu, Jennifer < Siu.Jennifer@epa.gov > **Subject:** Cargill - Redwood City inspection

Hi Jennifer,

This includes the inspection report that was entered into CIWQS. The summary gets cut off a bit in this PDF file. Here's the entire summary:

"Inactive site. Baywater is pumped into a manifold and diverted to a series of clay lined evaporation ponds and salt is harvested every 3-4 years. Bittern can be pumped across Dunbarton bridge to Newark. Some old tanks contain diesel fuel that are a spill potential to Bay."

Please let me know if you have any more questions. Thank you, Robert 510.622.2478